
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie
Nelson, Tannen Maury, Stephen
Maturen, Edward Ou, Timothy Evans,
Chris Tuite, and The Communications
Workers of America,
*On behalf of themselves and other
similarly situated individuals,*

Plaintiffs,

v.

City of Minneapolis; Minneapolis
Chief of Police Medaria Arradondo *in
his individual and official capacity*;
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity*; Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and official
capacity*; Minnesota State Patrol
Colonel Matthew Langer, *in his
individual and official capacity*;
Minnesota State Patrol Major Joseph
Dwyer, *in his individual capacity*;
Hennepin County Sheriff David
Hutchinson, *in his individual and official
capacity*; John Does 1-10, *in their
individual and official capacities*;

Defendants.

Ct. File No. 20-cv-01302
(WMW/DTS)

**DECLARATION OF
HEATHER ROBERTSON
IN SUPPORT OF
CITY DEFENDANTS'
MOTION FOR
SUMMARY JUDGMENT**

Your Declarant is Heather P. Robertson, and she submits the following declaration on behalf of the Defendants City of Minneapolis and former Minneapolis Chief of Police Medaria Arradondo in his official capacity (“City Defendants”):

1. I am an Assistant City Attorney with the Minneapolis City Attorney’s Office. I am one of the attorneys assigned to represent the City Defendants. I submit this declaration in support of their Motion for Summary Judgment.

2. Attached as Exhibit A is a true and correct copy of the Investigation of the City of Minneapolis and the Minneapolis Police Department, United States Department of Justice Civil Rights Division and United States Attorney’s Office District of Minnesota Civil Division (June 16, 2023).

3. Attached as Exhibit B is a true and correct copy of the Agreement in Principle Between the United States and the City of Minneapolis and the Minneapolis Police Department entered into on June 15, 2023.

4. Attached as Exhibit C and filed under seal is a true and correct copy of body-worn camera video from May 27, 2020 and disclosed to Plaintiffs on November 29, 2022 as .MPLS007382.

5. Attached as Exhibit D and filed under seal is a true and correct copy of body-worn camera video from May 29, 2020 and disclosed to Plaintiffs on November 29, 2022 as .MPLS007384.

6. Attached as Exhibit E and filed under seal is a true and correct copy of body-worn camera video from May 30, 2020 and disclosed to Plaintiffs on November 29, 2022 as .MPLS007389.

7. Attached as Exhibit F and filed under seal is a true and correct copy of body-worn camera video from May 31, 2020 and disclosed to Plaintiffs on November 29, 2022 as .MPLS007391.

8. Attached as Exhibit G and filed under seal is a true and correct copy of body-worn camera video from May 31, 2020 and disclosed to Plaintiffs on November 29, 2022 as .MPLS007393.

9. Plaintiffs did not subpoena or otherwise disclose any attempt to gather information from or about the DOJ investigation before the close of fact discovery.

10. Investigators from the Department of Justice did not attempt to speak with the attorneys for the City of Minneapolis who were representing the City and City employees in litigation relating to protests.

11. In other litigation regarding policing of the George Floyd protests from May 26-May 31, 2020, the City disclosed more than 4,000 body-worn camera videos that depicted members of the MPD policing protests.

I declare under penalty of perjury that everything I have stated in this document is true and correct to the best of my knowledge. Signed in Ramsey County, Minnesota.

Dated: June 30, 2023

/s Heather P. Robertson

Heather P. Robertson